

TAVIA GALONSKI

2024 MAY -7 PM 3: 44 IN THE COURT OF COMMON PLEAS  
SUMMIT, COUNTY, OHIO



Plaintiff

SUMMIT COUNTY  
CLERK OF COURTS

# 2024 05 1933

Everlastene Jacobs

324 Noah Ave

Akron, Ohio 44320

JUDGE  
MARY MARGARET ROWLANDS

Vs.

Defendant

Great Clips

412 Howe Ave

Akron, Ohio 44310

On June 1<sup>st</sup>, I was hired by the above named respondent. My most recently held position was hairstylist. Around June 3, 2023; I was told by my supervisor; Betty, and Kayla Stack that my hair cuts where not up to standards. Although I was told that I would be placed into Great Clips academy this never happened. Also I was told by Kayla Stack, that I would be able to work as the receptionist while in Great Clips academy. However she advised me that the receptionist position was for someone else, and she couldn't take from the other employee. Subsequently, I was terminated on June 3, 2023. I believe I am a great hairstylist, I even received tips from three or four clients that I serviced; and I have proof.

Emotional distress occurs when you experience an extreme level of unpleasant emotions.

Emotional distress is a state of mental anguish that may involve a variety of symptoms.

Emotional distress may result from a mental health issue, or particular circumstances, such as relationships difficulties, or financial strain. Emotional distress at work may include concerns about job security, low pay, poor working conditions, increasing responsibility, and relationships with colleagues or managers. Emotional distress is a state of emotional suffering.-

(Medical News Today) I have great emotional distress. They also owe me money. I was only paid for 6.44 hours in the amount of \$80.00 cash.

- It is unlawful to discriminate against any employee or applicant for employment because of race or color in regard to hiring, termination, promotion, compensation, job training, or any other term, condition, or privilege of employment. (US DEPARTMENT OF COMMERCE)
- Title VII of the Civil Rights Act of 1964 protects individuals against employment discrimination on the basis of race and color as well as national origin, sex, or religion. (Equal Opportunity Commission)
- Racial discrimination's definition is treating someone (an applicant or employee) unfavorably because he/she is of a certain race or because of personal characteristics associated with race (such as hair texture, skin color, or certain facial features). Color discrimination involves treating someone unfavorably because of skin color complexion.
- Race/color discrimination also can involve treating someone unfavorably because the person is married to (or associated with) a person of a certain race or color.
- Discrimination can occur when the victim and the person who inflicted the discrimination are the same race or color. (Equal Opportunity Commission)
- The law forbids discrimination when it comes to any aspect of employment, including hiring, firing, pay, job assignments, promotions, layoff, training, fringe benefits, and any other term or condition of employment.

(Equal Opportunity Commission.

This leaves me no choice but to sue legally in court, and I'm requesting a Million dollar Prayer 1,000,000 for my pain and suffering.

Sincerely,

Everlastene Blossom Jacobs

Friday, May 3, 2024

*Everlastene Jacobs*

To Whom It May Concern my name is Everlastene Jacobs, I am sending this demand letter in hopes that we can settle this situation amicably. I am requesting a prayer of 1 million dollars. A copy of this demand letter has been sent to the Great Clips Headquarters. 7700 France Ave S, Suite 425 Minneapolis, MN 425 55435. 1-800-473-2825

**A copy has been mailed to Steve Hockett (CEO), Ray Barton (Chairman of the Board), Rhoda Olsen (Vice Chair of the Board, Rob Goggin's (President), Yvonne Mercer (Chief Operations Officer), Rachelle Johnson (Chief Financial Officer), Sarah Yatchak ( Vice President of Operations), Lisa Hake (Vice President of Marketing & Communications), Adam Husemann ( Vice President of Expansion), Jared Nypen (Vice President of Talent), Michelle Sack ( Vice President of Learning & Development, Kerry Bundy( Vice President of legal counsel)**

**<https://www.greatclips.com/about-us/leadership/>**

## **Exhibits**

- **Charge of discrimination ( Ohio civil rights commission) (EEOC)**
  - **Great Clips tips receipts**
  - **Great Clips Academy paperwork**
- **Great clips schedule for three days; amount of hour's great clips paid me for.**

EEOC Form 5 (11/09)

<b>CHARGE OF DISCRIMINATION</b>  This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.		Charge Presented To:      Agency(ies) Charge No(s):  <div style="display: flex; justify-content: space-between;"> <span>EEOC</span> <span><b>532-2024-01702</b></span> </div> <div style="display: flex; justify-content: space-between;"> <span>FEPA</span> <span></span> </div>	
<b>Ohio Civil Rights Commission</b> <i>State or local Agency, if any</i>		and EEOC	

I Name (indicate Mr., Ms., Mrs., Miss, Mx., Dr., Hon., Rev.) <b>Ms. Everlastene B. Jacobs</b>	Home Phone <b>(330) 329-2660</b>	Year of Birth <b>1987</b>
Street Address <b>324 Noah Ave AKRON, OH 44320</b>		
Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I Believe Discriminated Against Me or Others. (If more than two, list under PARTICULARS below.)		
Name <b>Great Clips</b>	No. Employees, Members <b>501+ Employees</b>	Phone No. 
Street Address <b>412 Howe Ave AKRON, OH 44310</b>		
Name 	No. Employees, Members 	Phone No. 
Street Address      City, State and ZIP Code 		

DISCRIMINATION BASED ON  <b>Color, Race</b>	DATE(S) DISCRIMINATION TOOK PLACE  <div style="display: flex; justify-content: space-between;"> <span>Earliest</span> <span>Latest</span> </div> <div style="display: flex; justify-content: space-between;"> <span>06/03/2023</span> <span>06/03/2023</span> </div>
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THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)):

On or about June 1, 2023, I was hired by the above-named Respondent. My most recently held position was Hair Stylist.

In or about June 3, 2023, I was told by my supervisor, Kayla Stack that my hair styles were not up to standards. Although I was told I would be placed into Great Clips Academy this never happened. Subsequently, I was terminated on or around June 3, 2023.

I believe I have been discriminated against due to my race, Black, and my color, Darkskin, in violation of Title VII of the Civil Rights Act of 1964, as amended.

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.	NOTARY – When necessary for State and Local Agency Requirements
I declare under penalty of perjury that the above is true and correct.  <b>Digitally Signed By: Ms. Everlastene B. Jacobs</b>  <b>03/08/2024</b>  <div style="text-align: right;"><i>Charging Party Signature</i></div>	I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief. SIGNATURE OF COMPLAINANT   SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE (month, day, year)

CP Enclosure with EEOC Form 5 (11/09)

**PRIVACY ACT STATEMENT:** Under the Privacy Act of 1974, Pub. Law 93-579, authority to request personal data and its uses are:

1. **FORM NUMBER/TITLE/DATE.** EEOC Form 5, Charge of Discrimination (11/09).
2. **AUTHORITY.** 42 U.S.C. 2000e-5(b), 29 U.S.C. 211, 29 U.S.C. 626, 42 U.S.C. 12117, 42 U.S.C. 2000ff-6.
3. **PRINCIPAL PURPOSES.** The purposes of a charge, taken on this form or otherwise reduced to writing (whether later recorded on this form or not) are, as applicable under the EEOC anti-discrimination statutes (EEOC statutes), to preserve private suit rights under the EEOC statutes, to invoke the EEOC's jurisdiction and, where dual-filing or referral arrangements exist, to begin state or local proceedings.
4. **ROUTINE USES.** This form is used to provide facts that may establish the existence of matters covered by the EEOC statutes (and as applicable, other federal, state or local laws). Information given will be used by staff to guide its mediation and investigation efforts and, as applicable, to determine, conciliate and litigate claims of unlawful discrimination. This form may be presented to or disclosed to other federal, state or local agencies as appropriate or necessary in carrying out EEOC's functions. A copy of this charge will ordinarily be sent to the respondent organization against which the charge is made.
5. **WHETHER DISCLOSURE IS MANDATORY; EFFECT OF NOT GIVING INFORMATION.** Charges must be reduced to writing and should identify the charging and responding parties and the actions or policies complained of. Without a written charge, EEOC will ordinarily not act on the complaint. Charges under Title VII, the ADA or GINA must be sworn to or affirmed (either by using this form or by presenting a notarized statement or unsworn declaration under penalty of perjury); charges under the ADEA should ordinarily be signed. Charges may be clarified or amplified later by amendment. It is not mandatory that this form be used to make a charge.

#### **NOTICE OF RIGHT TO REQUEST SUBSTANTIAL WEIGHT REVIEW**

Charges filed at a state or local Fair Employment Practices Agency (FEPA) that dual-files charges with EEOC will ordinarily be handled first by the FEPA. Some charges filed at EEOC may also be first handled by a FEPA under worksharing agreements. You will be told which agency will handle your charge. When the FEPA is the first to handle the charge, it will notify you of its final resolution of the matter. Then, if you wish EEOC to give Substantial Weight Review to the FEPA's final findings, you must ask us in writing to do so within 15 days of your receipt of its findings. Otherwise, we will ordinarily adopt the FEPA's finding and close our file on the charge.

#### **NOTICE OF NON-RETALIATION REQUIREMENTS**

Please **notify** EEOC or the state or local agency where you filed your charge **if retaliation is taken against you or others** who oppose discrimination or cooperate in any investigation or lawsuit concerning this charge. Under Section 704(a) of Title VII, Section 4(d) of the ADEA, Section 503(a) of the ADA and Section 207(f) of GINA, it is unlawful for an *employer* to discriminate against present or former employees or job applicants, for an *employment agency* to discriminate against anyone, or for a *union* to discriminate against its members or membership applicants, because they have opposed any practice made unlawful by the statutes, or because they have made a charge, testified, assisted, or participated in any manner in an investigation, proceeding, or hearing under the laws. The Equal Pay Act has similar provisions and Section 503(b) of the ADA prohibits coercion, intimidation, threats or interference with anyone for exercising or enjoying, or aiding or encouraging others in their exercise or enjoyment of, rights under the Act.

**Great Clips®**

Chapel Hill Plaza  
(330) 945-7273  
Cuyahoga Falls, OH 44221  
12:54pm 07-03-2023 Ever

Invoice#636140  
Salon#2904

SUBTOTAL 0.00  
INVOICE TOTAL 0.00  
AMT TENDERED 5.00  
VISA 0.00

(Ever)

Sale  
ACCT: \*\*\*\*\*5678  
EMV TAP  
Approval: 037035  
EMV AID:A0000000031010  
EMV APP NAME:VISA DEBIT  
ARQC:04598CD78D37F74

Charged tip for Ever 5.00

Total 5.00

GREAT CLIPS COMMITMENT  
Your complete satisfaction on all  
services and products is fully  
guaranteed!

Thank you for choosing GREAT CLIPS!

It's Gonna Be Great

Next time, Save Time -  
Use Online Check-In

\*\* CASHHOLDER COPY \*\*

GREAT CLIPS  
Chapel Hill Plaza  
(330) 945-7273  
Cuyahoga Falls, OH 44221  
12:01pm 07-03-2023 Ever

David Irman Invoice#636128  
Salon#2904

Haircut 16.00  
SUBTOTAL 16.00  
INVOICE TOTAL 16.00  
AMT TENDERED 20.00  
VISA 16.00

(Ever)

Sale  
ACCT: \*\*\*\*\*5603  
INSERT  
Approval: 419137  
EMV AID:A0000000031010  
EMV APP NAME:VISA DEBIT  
ARQC:6FB8D946D0F1934D

Charged tip for Ever 4.00  
DAVID's Stylist

Total 20.00

\*\* MERCHANT COPY \*\*

GREAT CLIPS  
Chapel Hill Plaza  
(330) 945-7273  
Cuyahoga Falls, OH 44221  
11:17am 07-03-2023 Ever

Brian Shaffer Invoice#636115  
Salon#2904

Haircut 16.00  
SUBTOTAL 16.00  
INVOICE TOTAL 16.00  
AMT TENDERED 21.00  
MasterCard 16.00

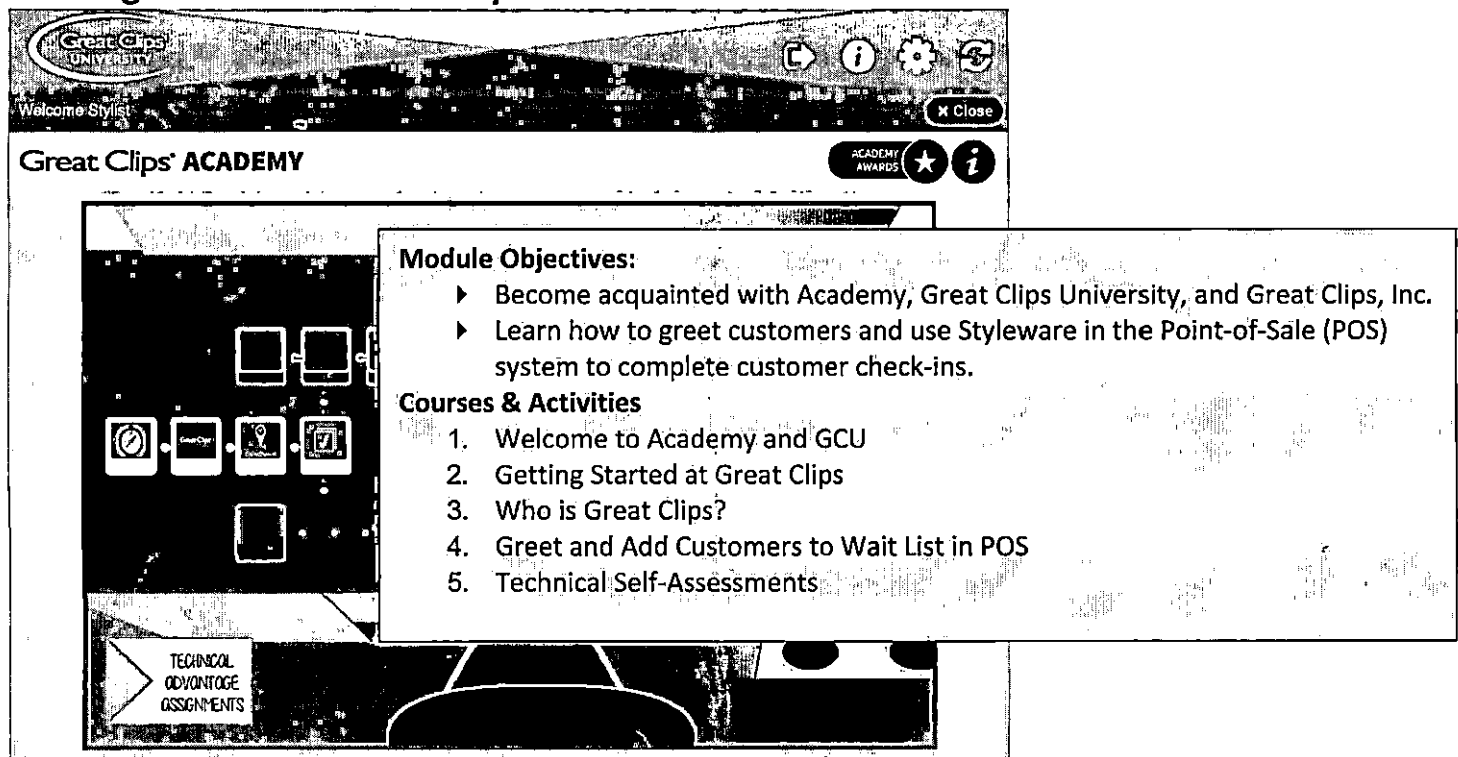
(Ever)

Sale  
ACCT: \*\*\*\*\*1848  
INSERT  
Approval: 233506  
EMV AID:A0000000041010  
EMV APP NAME:MASTERCARD DEBIT  
ARQC:4F3C895C9C9B8F98

Charged tip for Ever 5.00  
BRIAN's Stylist

# Academy

## Getting Started at Great Clips



**Module Objectives:**

- ▶ Become acquainted with Academy, Great Clips University, and Great Clips, Inc.
- ▶ Learn how to greet customers and use Styleware in the Point-of-Sale (POS) system to complete customer check-ins.

**Courses & Activities**

1. Welcome to Academy and GCU
2. Getting Started at Great Clips
3. Who is Great Clips?
4. Greet and Add Customers to Wait List in POS
5. Technical Self-Assessments



TECHNICAL ADVANTAGE ASSIGNMENTS

### Reflect and Prepare Questions:

Answer the following questions during the course:

1. How does GCU benefit me in my role as a stylist?
2. Why should I ask the customer for their personal information as a part of the greeting and check-in process?

### WORK WITH MY MANAGER TO COMPLETE MY TRAINING IN THIS MODULE:

- ☐ Discuss and review expectations and policies for using GCU.
- ☐ Greet and enter several customers into the Styleware Point-of-Sale (POS) System.
- ☐ Spend time with my manager and co-workers learning more information about the POS and how I am expected to use it.
- ☐ Complete the  Technical Self-Assessments to be able to advance to the next module.
- ☐ Click on  "Technical Advantage Assignments" on the Academy game card and review my assignments with my manager.

### QUESTIONS I HAVE ABOUT THIS MODULE:

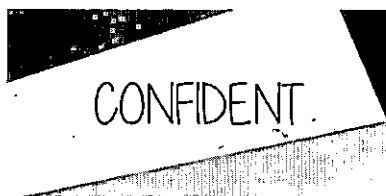
### During the GREAT Academy session, be prepared to:

- ☐ Discuss what a franchise organization is and who your franchisee is.
- ☐ Ask any questions you have about Online Check-In.



# Great Clips® Academy

which also includes Floor time with a  
manican to practice haircutting.



## Participant Journal & The GREAT Academy Participant Packet

Getting Started at Great Clips	2
Delivering a Great Customer Experience	4
Furthering Your Technical Advantage	7
Growing with Great Clips	9
Checklist	10
Participant Packet	

### Completing the Academy Journal

Review the Academy Journal questions before completing each course.

Complete the Journal while taking each course.

Journals must be completed prior to attending the session of The GREAT Academy.

Complete all Work with My Manager items in the Journal prior to attending The GREAT Academy.

Be prepared with all the information from the During the GREAT Academy section.

GREAT  
CLIPS

Everlastene  
6.44 hrs

Everlastene  
Sun 7/2 10-4  
Mon 7/3 11-5  
Fri 7/7 11-5